

## **U.S.** Department of Justice

United States Attorney Southern District of New York

Jacob K. Javits Federal Building 26 Federal Plaza, 37th Floor New York, New York 10278

April 18, 2025

## **BY ECF**

The Honorable John G. Koeltl United States District Court Southern District of New York United States Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. Alexander Mashinsky, 23 Cr. 347 (JGK)

Dear Judge Koeltl:

The Government respectfully requests an extension of the deadline to file its sentencing submission in this matter from April 24, 2025 to April 28, 2025. Defense counsel consents to the request, provided that defense counsel's reply brief deadline is extended to May 2, 2025.

Early this morning, defendant Alexander Mashinsky filed a 64-page sentencing submission, along with an additional 70-page submission detailing objections to the Presentence Investigation Report ("PSR"). The defendant objects to approximately 103 paragraphs of the PSR. The Government received the defendant's supporting exhibits to these submissions this afternoon.

The requested brief extension of the Government's submission deadline will allow the Government to carefully consider the defense objections, provide the Court with relevant factual information and supporting exhibits as necessary to respond, and provide the Court with effective advocacy regarding the nature of the factual disputes and imposition of an appropriate sentence.

Respectfully submitted,

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By:\_\_\_\_\_

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Cc: Defense Counsel, (by ECF)